

EXHIBIT- D

DECELARATION of AARON READ

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

<u>Court Address:</u> 719 Church Street Nashville, Tennessee 37203 IAN HUNTER LUCAS, Pro Se Plaintiff/Petitioner v. MARY ANN JESSEE, et al. Defendant/Respondent	Case/Docket No. <u>3:24-cv-00440</u> Division: <u>NASHVILLE</u> Judge: <u>Judge Waverly D. Crenshaw, Jr.</u> <u>Magistrate Judge Alistair E. Newbern</u>
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DECLARATION**of**

State of Tennessee

Aaron Read

I, **Aaron Read**, being of sound mind and body, swear and confirm as follows:

1. I currently reside at 1403 Shell Road , Goodlettsville , Tennessee, 37072.
2. I am over the age of 18.
3. DECLARATION OF **AARON READ** STATE OF TENNESSEE COUNTY OF DAVIDSON

I, **Aaron Read**, hereby declare and state as follows: 1. AFFIRMATION OF TRUTHFULNESS I affirm that, under penalty of perjury under the laws of the State of Tennessee and the United States of America, the following statements, facts, and assertions are true and correct to the best of my knowledge, recollection, and belief. 2. EMPLOYMENT HISTORY WITH METRO I began my engagement as an employee with Metro Nashville Fire Department in September of the year 2019 after an extended period exceeding ten years. Throughout the course of my professional tenure at Metro, I upheld a record of conduct and performance that could be characterized as exemplary. My employment record, unblemished, a fact that is corroborated by the multiple commendatory evaluations I received. My employment dossier notably highlights my status as eligible for rehire within the organization.

1. COERCED RESIGNATION AND THE CIRCUMSTANCES OF APRIL 15TH, 2024 On the 4/12/2024, concurrent with the surfacing of ex parte communications by Vanderbilt University implicating me, Fred Smith, my erstwhile supervisor, confronted me with a choice—either to voluntarily resign from my position or be subjected to the process of termination. This course of action was onset shortly following a legal pursuit initiated on April 11th, 2024, by Mr. Ian Lucas, an alumnus paramedic of our department and at that time, a student at Vanderbilt University, who raised issues in concern to the propriety of these communications with another individual, Mr. Jeremy Bourgoïn. Such communications, it is alleged, improperly referenced actions such as the swapping of assigned shifts that transpired during the interval of Mr. Lucas's concurrent employment at our department and academic attendance at Vanderbilt University, indicating potential procedural infractions and the existence of internal conflict within our department. IN WITNESS WHEREOF, I have executed this declaration to avail all interested parties of my circumstances, and to lend support to my aspirations in seeking an equitable redress and resolution to the aforementioned grievances.

I declare under penalty of perjury under the laws of the State of Tennessee that the foregoing is true and correct.

 DocuSigned by:
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Aaron Read

Date: 5/12/2024

(Affiant's signature)